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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IMPOSSIBLE FOODS INC.,

Plaintiff / Counter-Defendant,

v.

IMPOSSIBLE LLC and JOEL RUNYON,

Defendants / Counter-Plaintiffs.

Case No. 5:21-cv-02419-BLF (SVK)

**DECLARATION OF GREG
WASHINGTON IN SUPPORT OF
DEFENDANTS/COUNTER-PLAINTIFFS
IMPOSSIBLE LLC AND JOEL
RUNYON'S MOTION FOR RULE 11
SANCTIONS; MEMORANDUM OF
POINTS AND AUTHORITIES**

Judge: Hon. Beth Labson Freeman
Compl. Filed: April 2, 2021
Third Am.
Compl. Filed: March 7, 2025
Hearing Date: November 14, 2025
Hearing Time: 9:00 a.m.

1 I, Greg Washington, declare:

2 1. I am an attorney licensed to practice before this Court and am counsel of record on
3 behalf of Defendants/Counter-Plaintiffs Impossible LLC and Joel Runyon (together “Impossible
4 LLC”). I make this declaration based on personal knowledge. If called as a witness, I could and
5 would testify competently to the facts stated here.

6 2. Attached as **Exhibit A** is a true and correct copy of Impossible LLC’s First Set of
7 Requests for Production, served on March 12, 2024.

8 3. Attached as **Exhibit B** is a true and correct copy of Impossible LLC’s Second Set of
9 Requests for Production, served on September 19, 2024.

10 4. Attached as **Exhibit C** is a true and correct copy of Impossible Foods’s Third
11 Supplemental Responses to Defendants' First Set of Interrogatories, served on March 5, 2025.

12 5. Attached as **Exhibit D** is a true and correct copy of portions of the transcript of the
13 deposition of John Plumpe, taken on June 25, 2025.

14 6. Attached as **Exhibit E** is a true and correct copy of Impossible LLC’s Notice of
15 Rule 30(b)(6) Deposition of Impossible Foods Inc., served on March 14, 2025.

16 7. Attached as **Exhibit F** is a true and correct copy of email correspondence between
17 counsel for Impossible LLC and Impossible Foods Inc., dated March 28, 2025.

18 8. Attached as **Exhibit G** is a true and correct copy of portions of the transcript of the
19 deposition of Caitlyn Hatman, taken on April 1, 2025.

20 9. Attached as **Exhibit H** is a true and correct copy of portions of the transcript of the
21 deposition of Keaton Schwarz, taken on April 3, 2025.

22 10. Attached as **Exhibit I** is a true and correct copy of the letter from Adam S. Cashman
23 to Forrest Flemming III, dated April 11, 2025.

24 11. Attached as **Exhibit J** is a true and correct copy of email correspondence between
25 counsel for Impossible LLC and Impossible Foods Inc., dated April 15, 2025.

26 I swear under penalty of perjury under the laws of the United States that the foregoing is true
27 and correct.
28

1 Dated: September 12, 2025

By: /s/ Greg Washington
Greg Washington

Attorney for Defendants / Counter-Plaintiffs
Impossible LLC and Joel Runyon